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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK ORIGINAL

UNITED STATES OF AMERICA

SEALED INDICTMENT

- v. -

YIGAL ALON MAKHULF, a/k/a "Alon Makhulf," a/k/a "Allen Makhulf,"

07 CRIM 630

Defendant.

COUNT ONE

The Grand Jury charges:

- TOTAL DESIGNATION OF THE PARTY From in or about October 2006, up to and including in cr about July 2007, in Bangkok, Thailand and elsewhere, YIGAL ALON MAKHULF, a/k/a "Alon Makhulf," a/k/a "Allen Makhulf," the defendant, and others known and unknown, unlawfully, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.
 - It was a part and an object of said conspiracy that YIGAL ALON MAKHULF, a/k/a "Alon Makhulf," a/k/a "Allen Makhulf," the defendant, and others known and unknown, would and did distribute a controlled substance, to wit, 3,4-Methylenedioxymethamphetamine (commonly known as "MDMA" or "Ecstasy"), intending and knowing that such substance would be unlawfully imported into the United States or into waters within a distance of 12 miles of the coast of the United States, in violation of

Sections 959, 960(a)(3) and 960(b)(3) of Title 21, United States Code.

OVERT ACTS

- 3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed:
- a. On or about November 30, 2006, YIGAL ALON MAKHULF, a/k/a "Alon Makhulf," a/k/a "Allen Makhulf," the defendant, and other co-conspirators not named as defendants herein, distributed 300 Ecstasy tablets in Bangkok, Thailand.
- b. On or about June 28, 2007, YIGAL ALON MAKHULF, a/k/a "Alon Makhulf," a/k/a "Allen Makhulf," the defendant, met in Bangkok, Thailand, with a Special Agent of the Drug Enforcement Administration working in an undercover capacity, and discussed the sale of 20,000 Ecstasy tablets.

(Title 21, United States Code, Section 963.)

COUNT TWO

The Grand Jury further charges:

4. On or about November 30, 2006, in Bangkok, Thailand, YIGAL ALON MAKHULF, a/k/a "Alon Makhulf," a/k/a "Allen Makhulf," the defendant, distributed a controlled substance, to wit, 3,4-Methylenedioxy-methamphetamine (commonly known as "MDMA" or "Ecstasy"), and aided and abetted such distribution, intending and knowing that such substance would be unlawfully imported into

the United States or into waters within a distance of 12 miles of the coast of the United States.

(Title 21 United States Code, Sections 959(a) and (c), 960(a)(3) \$& 960(b)(3) and Title 18, United States Code, Section 2).

MICHAEL J. GARCIA

United States Attorney

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Defendant.

SEALED INDICTMENT

21 U.S.C. §§ 963, 959

MICHAEL J. GARCIA United States Attorney.